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*Attorneys for Defendants,  
The Credit Pros International Corporation  
and Jason Kaplan*

JOSHUA CHAMPION,

Plaintiff,

v.

THE CREDIT PROS INTERNATIONAL  
CORPORATION, a New Jersey corporation,  
and JASON KAPLAN,

Defendants.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CASE NO.: 2:21-cv-10814-CCC-JBC

**NOTICE OF MOTION TO DISMISS**

**PLEASE TAKE NOTICE** that Defendants The Credit Pros International Corporation and Jason Kaplan, by and through their undersigned counsel, will move the Honorable Claire C.

Cecchi, U.S.D.J. on August 16, 2021 for an Order, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the complaint [D.E. 1] in its entirety.

**PLEASE TAKE FURTHER NOTICE** that, in support of their motion, Defendants rely upon the brief submitted with this Notice of Motion and upon all pleadings and proceedings on file in this action.

**PLEASE TAKE FURTHER NOTICE** that a Proposed Order granting this motion is attached.

Dated: July **20**, 2021.

Respectfully submitted,

By: /s/ Joshua Deal  
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JAMEY R. CAMPELLONE\*  
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*The Credit Pros International Corporation*  
*and Jason Kaplan*

**CERTIFICATE OF SERVICE**

I hereby certify that I caused Defendants' Notice of Motion to Dismiss, Brief in Support, and Proposed Order to be filed through the ECF system and notice will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Joshua M. Deal

Joshua M. Deal